



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL CLEANUP

August 28, 2017

Mr. Bob Wyatt  
NW Natural  
220 NW 2nd Avenue  
Portland, Oregon 97209

*sent via email only*

Mr. Myron Burr  
Siltronic Corporation  
7200 NW Front Avenue, M/S 20  
Portland, Oregon 97210-3676

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has reviewed NW Natural's August 23, 2017 response to EPA's August 21, 2017 letter presenting EPA and Oregon Department of Environmental Quality (ODEQ) comments on the *NW Natural Proposed Summer 2017 Initial Pre-Remedial Design Data Gaps Field Sampling – Gasco Sediments Site* memorandum (Data Gaps memorandum) dated August 7, 2017 for the Gasco Sediments Site. The comments had two general themes: 1) a request for an expanded description of the intended purpose of the sampling locations (particularly with regard to validating seepage capture predicted by a groundwater model developed by NW Natural for the Gasco Sediments Site), and 2) a request that surface sediment, transition zone water (TZW) and near-bottom surface water samples be analyzed for the entire list of contaminants provided in Table 17 of the Portland Harbor Record of Decision (ROD) as well as site-specific Gasco uplands contaminants of concern (COCs) not included in the ROD Table 17.

The EPA discussed the request for an expanded analytical suite with NW Natural and based on this discussion EPA requested that chemical analysis of surface sediment, TZW and near-bottom surface water be removed from the 2017 data gaps scope. The EPA conveyed its expectation that for a site-specific baseline event, the full Table 17 list by media will be needed to support a possibly more targeted (relative to COCs sampled for) effort going forward for monitoring and design purposes. The scope presented in the Data Gaps memorandum is too limited to address the larger intent of the comprehensive sampling and analysis. Analysis of surface sediment, TZW and near-bottom surface water samples for the ROD Table 17 analytes and site-specific Gasco uplands COCs should be considered in development of the scope for the *Draft Pre-Remedial Design Data Gaps Work Plan and Sampling and Analysis Plan* (Work Plan) expected to be submitted to the EPA in late 2017 or early 2018. The 2017 data gaps scope will focus on obtaining seepage meter data for offshore groundwater flux impacted by the operation of the hydraulic control and containment (HC&C) system. The EPA finds the explanation for and locations of the proposed six seepage meters acceptable for the 2017 interim investigation. The EPA will be available during the Work Plan development to discuss with NW Natural the scope and use of the expanded analytical suite.

The EPA has also reviewed the *Revised NW Natural Proposed Summer 2017 Initial Pre-Remedial Design Data Gaps Field Sampling – Gasco Sediments Site* and *Anchor QEA Revised Summer 2017 Interim Pre-Remedial Design Data Gaps Sampling Health and Safety Plan* dated August 23, 2017. The EPA has no further comments on this health and safety plan.

The EPA conditionally approves the revised Data Gaps memorandum dated August 23, 2017. This approval is conditional on satisfactory acceptance of the diver certifications associated with the health the safety plan developed by Research Support Services scheduled for delivery early in the week of August 28, 2017.

Please let me know if you would like to discuss this letter/attached comments, or have any questions or concerns at (206) 553-1220 or via email at [sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read 'SS', followed by a long horizontal line extending to the right.

Sean Sheldrake, RPM

Cc: Dana Bayuk, DEQ

*via email only*